1 2 3 4 5 6 7	LAWRENCE A. ORGAN (SBN 175503) NAVRUZ AVLONI (SBN 279556) CIMONE A. NUNLEY (SBN 362915) CALIFORNIA CIVIL RIGHTS LAW GROUP 332 San Anselmo Ave. San Anselmo, California, 94960 Telephone: (415) 453-4740 Facsimile: (415) 785-7352 larry@civilrightsca.com navruz@civilrightsca.com	
8	J. BERNARD ALEXANDER (SBN 128307) ALEXANDER KRAKOW + GLICK LLP	
9	1900 Avenue of the Stars, Suite 900	
10	Los Angeles, California 90067 Telephone: (310) 394-0888	
11	Facsimile: (310) 394-0811	
	balexander@akgllp.com	
12	Attorneys for Plaintiffs	
13	DEMETRIC DI-AZ and OWEN DIAZ	
14	LIMITED STATES	DISTRICT COURT
15	UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA	
16	NORTHERN DISTRI	CI OF CALIFORNIA
17		Case No. 3:17-cv-06748-WHO
18	DEMETRIC DI-AZ, OWEN DIAZ, and LAMAR PATTERSON,	
19		DECLARATION OF SABRINA GRISLIS IN SUPPORT OF PLAINTIFFS'
20	Plaintiffs,	MOTION IN LIMINE NO. 2.
21	v.	Date: May 11, 2020
	TESLA, INC. dba TESLA MOTORS, INC.;	Time: 10:00 a.m.
22	CITISTAFF SOLUTIONS, INC.; WEST VALLEY STAFFING GROUP;	Courtroom: 2, 17th Floor Judge: Hon. William H. Orrick
23	CHARTWELL STAFFING SERVICES, INC.; and DOES 1-50, inclusive,	Judge. Holl. William H. Offick
24	Defendants.	Trial Date: June 8, 2020
25	Defendanto.	Complaint filed: October 16, 2017
26		
27		
28		

## I, SABRINA GRISLIS, hereby declare:

- 1. I am a paralegal with the law firm of California Civil Rights Law Group, attorneys of record for Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Declaration in support of Plaintiffs' Motion *in Limine* No. 2. I have personal knowledge of the facts stated herein and if called upon to testify, I could and would competently testify thereto, except as to those matters that are stated upon information and belief.
- 2. Attached hereto and marked as **Exhibit 1** is a true and correct copy of the Proof of Service that I received from our process server for service of a deposition subpoena on Ramon Martinez dated October 2, 2019 at 6:55 pm.
- 3. On or around October 2, 2019, I received a phone call from someone identifying themself as Ramon Martinez. He said he just received a deposition subpoena for a Ramon Martinez, but he was the wrong person. He told me that he has never worked for Tesla, Inc. and that there are several people with the name Ramon Martinez in his neighborhood.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 20, 2020 in San Anselmo, California.

DATED: April 20, 2020

By: Sabrina Grislis